

Brian M. Heberlig  
202 429 8134  
bheberlig@steptoe.com

1330 Connecticut Avenue, NW  
Washington, DC 20036-1795  
202 429 3000 main  
www.steptoe.com

Steptoe

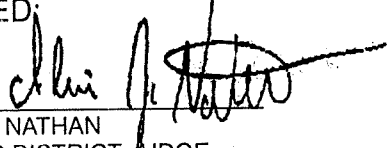
USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: FEB 28 2020

February 28, 2020

By ECF

The Honorable Alison J. Nathan  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2102  
New York, NY 10007

SO ORDERED:

2/28/20  
  
HON. ALISON J. NATHAN  
UNITED STATES DISTRICT JUDGE

Re: *United States v. Ali Sadr Hashemi Nejad*, Case No. 18-cr-224 (AJN)

Dear Judge Nathan:

So ORDERED [ We write to request that defendant Ali Sadr's curfew be extended to midnight until the conclusion of the trial to accommodate trial preparation. The extension of his curfew will enable Sadr to work with counsel on his defense. Sadr remains subject to electronic monitoring and his passports remain in the possession of pretrial services. Sadr requested the government's position by today by 12:00, but the government has not yet stated its position. Pretrial Services in Washington, D.C. (the agency supervising Sadr) has indicated that they consent to our request. We respectfully request expedited consideration of this motion to allow Mr. Sadr the ability to work in the late evenings with counsel this weekend.

Respectfully submitted,

/s/ Brian M. Heberlig  
Reid H. Weingarten  
STEPTOE & JOHNSON LLP  
1114 Avenue of the Americas  
New York, NY 10036  
Tel: (212) 506-3900  
Fax: (212) 506-3950  
rweingarten@steptoe.com

The Honorable Alison J. Nathan  
February 28, 2020  
Page 2

Steptoe

Brian M. Heberlig (*Pro Hac Vice*)  
Bruce C. Bishop (*Pro Hac Vice*)  
David M. Fragale  
Nicholas P. Silverman (*Pro Hac Vice*)  
STEPTOE & JOHNSON LLP  
1330 Connecticut Avenue, N.W.  
Washington, DC 20036  
Tel: (202) 429-3000  
Fax: (202) 429-3902  
bheberlig@steptoe.com

*Counsel for Defendant Ali Sadr Hashemi Nejad*

cc: Counsel of Record (via ECF)